



innovative solutions

of Georgia, LLC

Re: Innovative Solutions of Georgia, LLC – Robocall Mitigation Plan
(Updated to address FCC compliance requirements as of May 21, 2026)

1. Traceback Cooperation - Innovative Solutions of Georgia, LLC commits to fully cooperate with traceback requests from the FCC, law enforcement agencies, and the registered industry traceback consortium. The Company will respond promptly to traceback inquiries and will work with upstream providers to investigate and mitigate any suspected illegal robocall traffic originating from its services.

2. Customer Vetting / Know Your Customer (KYC) - Innovative Solutions of Georgia, LLC performs customer verification and Know Your Customer (KYC) review internally and does not currently utilize a third-party KYC vendor or automated onboarding platform.

All customers are subject to verification prior to service activation. This process includes:

- Verification of the customer's identity and authority to act on behalf of a business
- Review of business documentation, contact information, and intended business use of services
- Direct communication with the customer, including a live phone call or meeting with a Company representative
- Review of the customer's expected calling activity and service usage

The Company primarily provides hosted PBX services to known business customers and maintains direct business relationships with its customers as part of the onboarding and support process.

Customers who fail verification or whose proposed use of services appears suspicious, misleading, unlawful, or inconsistent with stated business operations are not permitted to activate service.

3. Traffic Monitoring & Fraud Detection - Innovative Solutions of Georgia, LLC reviews customer calling activity using internal account review procedures and call detail records available through the Company's hosted PBX platform and upstream service providers.

The Company reviews customer usage patterns for indicators of potential misuse, including:

- Abnormal or sudden changes in call volume
- Repetitive or sequential dialing patterns
- Traffic inconsistent with the customer's stated business purpose
- Patterns commonly associated with illegal robocalling, spam, spoofing, fraud, or traffic pumping

Customer traffic and account activity are reviewed by Company personnel. When suspicious or prohibited activity is identified, the Company may investigate the activity and take appropriate action, including warning, call blocking, rate limiting, suspension, or termination of service.

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4. Upstream Provider Support & Network-Level Monitoring - Innovative Solutions of Georgia, LLC relies on upstream voice service providers for certain network-level capabilities, including:

- STIR/SHAKEN authentication and attestation
- Network-level traffic monitoring
- Fraud detection and abuse monitoring support
- Traceback cooperation support

These upstream capabilities are incorporated into the Company's robocall mitigation procedures and are reviewed periodically as part of the Company's compliance program.

5. Exempt / Non-IP Traffic and ATAs - Innovative Solutions of Georgia, LLC supports the use of Analog Telephone Adapters (ATAs). ATA-based services, when deployed, are subject to the same customer vetting, traffic monitoring, and compliance requirements as all other services.

6. Compliance & Enforcement - All customers are required to comply with applicable federal and state laws governing legal calling practices, including the Telephone Consumer Protection Act (TCPA). The Company reserves the right to restrict, suspend, block, or terminate service for customers engaged in illegal robocalling, fraud, abuse, or misuse of services.

7. STIR/SHAKEN Authentication (Upstream Provider Reliance) - Innovative Solutions of Georgia, LLC does not implement STIR/SHAKEN authentication directly on its own network. However, STIR/SHAKEN authentication and attestation are applied to outbound calls through an upstream voice service provider.

The Company operates as a non-facilities-based voice service provider and does not control the SIP signaling or network infrastructure required to originate and sign calls.

All outbound calls originated by the Company's customers are transmitted through an upstream voice service provider that has implemented the STIR/SHAKEN framework and performs authentication and attestation on those calls prior to delivery to downstream carriers.

As such, STIR/SHAKEN authentication is applied to the Company's outbound traffic through its upstream provider, and the Company relies on this upstream implementation as part of its overall robocall mitigation strategy.

8. Documentation Review & Updates - This Robocall Mitigation Plan is reviewed and updated as necessary to reflect changes in customer onboarding procedures, upstream provider relationships, monitoring capabilities, or FCC rules and enforcement guidance.

If there are any questions or concerns regarding this plan, please contact my office.

Thank You

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